

Brent R. McIlwain, TSB 24013140
Holland & Knight LLP
200 Crescent Court, Ste. 1600
Dallas, TX 75201
Tel.: (214) 964-9500
Fax: (214) 964-9501
brent.mcilwain@hklaw.com

COUNSEL TO MEDALIST PARTNERS
OPPORTUNITY MASTER FUND II-A, L.P.

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

In re:

**FLEXIBLE FUNDING LTD. LIABILITY
CO., *et al.*,**

Debtors.

Case No. 21-42215 (mxm)

Chapter 11

(Jointly Administered)

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that the undersigned attorneys of **HOLLAND & KNIGHT LLP**, appearing on behalf of **MEDALIST PARTNERS OPPORTUNITY MASTER FUND II-A, L.P.**, request services of all notices and papers herein upon the addresses listed below, pursuant to section 1109 of Title 11 of the United States Code, 11 U.S.C. § 101 *et seq.*, and rules 2002, 3017, 9007, and 9010 of the Federal Rules of Bankruptcy Procedure.

HOLLAND & KNIGHT LLP
Brent R. McIlwain, Esq.
200 Crescent Court, Suite 1600
Dallas, Texas 75201
E-mail: brent.mcilwain@hklaw.com

PLEASE TAKE FURTHER NOTICE that the foregoing request includes all pleadings of any kind, including, without limitation, all notices, motions, complaints, and orders, whether

written or oral, formal or informal, however transmitted, related in any way to the debtors, their properties, or their estates. The undersigned request that their names be added to the mailing matrix.

PLEASE TAKE FURTHER NOTICE that neither this *Notice of Appearance and Request for Service of Papers* (the “Notice”) nor any later appearance, pleading, proof of claim, claim, or suit shall constitute a waiver of (i) the right to have final orders in noncore matters entered only after *de novo* review by a District Judge; (ii) the right to trial by jury in any proceeding triable in this case or any case, controversy, or proceeding related to these cases; (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; (iv) any objection to the jurisdiction of this Bankruptcy Court for any purpose other than with respect to this Notice; (v) an election of remedy; and (vi) any other rights, claims, actions, defenses, setoffs, and recoupments as appropriate, in law or in equity, under any agreements, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: September 23, 2021

HOLLAND & KNIGHT LLP

By: /s/ Brent McIlwain

Brent R. McIlwain, TSB 24013140

Holland & Knight LLP

200 Crescent Court, Ste. 1600

Dallas, TX 75201

Tel.: (214) 964-9500

Fax: (214) 964-9501

brent.mcilwain@hklaw.com

**COUNSEL TO MEDALIST PARTNERS
OPPORTUNITY MASTER FUND II-A, L.P.**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was electronically filed with the Clerk of Court using the CM/ECF system, and served upon all parties receiving notice pursuant to the CM/ECF system on this the 23rd day of September, 2021.

/s/ Brent R. McIlwain
Brent R. McIlwain, TSB 24013140